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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY DEFAULT
ON DEBTORS' MOTION PURSUANT TO FED. R.
BANKR. P. 4001(d) TO APPROVE STIPULATION
BETWEEN DEBTORS AND MICHAEL S. DANKO
AND MARY S. DANKO FOR MODIFICATION OF
AUTOMATIC STAY**

[Re: Dkt No. 4132]

Objection Deadline: October 25, 2019
4:00 p.m. (Pacific Time)

**No hearing requested absent timely objection. If
timely objection is filed, hearing reserved for:**

Date: November 13, 2019
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter an order by default on the *Debtors’ Motion Pursuant to Fed. R. Bankr. P. 4001(d) to Approve Stipulation Between Debtors and Michael S. Danko and Mary S. Danko for Modification of Automatic Stay* [Dkt. No. 4132] (the “**Motion**”).

RELIEF REQUESTED IN THE MOTION

The Motion seeks an order approving an agreement between the Debtors and Michael S. Danko and Mary S. Danko, individually and as trustees of the Michael and Mary Danko Living Trust dated July 27, 2007 as embodied in the *Stipulation Between Debtors and Michael S. Danko and Mary S. Danko for Modification of Automatic Stay* (the “**Stipulation**”), which was attached to the Motion as **Exhibit A**. A proposed order (the “**Proposed Order**”) was attached as **Exhibit B** to the Motion.

NOTICE AND SERVICE

A *Notice of Opportunity for Hearing on Debtors’ Motion Pursuant to Fed. R. Bankr. P. 4001(d) to Approve Stipulation Between Debtors and Michael S. Danko and Mary S. Danko for Modification of Automatic Stay* was filed concurrently with the Motion on September 11, 2019 [Dkt. No. 4135] (the “**Notice of Opportunity for Hearing**”). The Motion, the supporting declarations of Jana Contreras [Dkt. No. 4133] and Joseph Echols [Dkt. No. 4134], and the Notice of Opportunity for Hearing were served as described in the Certificate of Service of Andrew G. Vignali, filed on October 9, 2019 [Dkt. No. 4169].

The deadline to file responses or oppositions to the Motion has passed, and no oppositions have been filed with the Court or received by counsel for the Debtors.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

1. I am an attorney with the firm of Keller & Benvenuti LLP, co-counsel for the Debtors.

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no response or opposition has been filed with respect to the Motion.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Debtors hereby request entry of the Proposed Order substantially in the form attached to the Motion, granting the Motion as set forth therein.

Dated: October 28, 2019

**WEIL, GOTSHAL & MANGES LLP
KELLER & BENVENUTTI LLP**

/s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Debtors in Possession